

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)**

BLUE FLAME MEDICAL LLC,

Plaintiff,

v.

CHAIN BRIDGE BANK, N.A., JOHN J.
BROUGH, and DAVID M. EVINGER,

Defendants.

Civil Action No. 1:20-cv-00658

CHAIN BRIDGE BANK, N.A.,

Third-Party Plaintiff,

v.

JPMORGAN CHASE BANK, N.A.,

Third-Party Defendant.

**EXHIBIT LIST OF DEFENDANT/THIRD-PARTY PLAINTIFF CHAIN BRIDGE
BANK, N.A. AND DEFENDANTS JOHN J. BROUGH AND DAVID M. EVINGER**

Pursuant to Federal Rule of Civil Procedure 26(a)(3), Defendant/Third-Party Plaintiff Chain Bridge Bank, N.A. and Defendants John J. Brough, and David M. Evinger (collectively, “Defendants”) submit the following exhibit indices as their Exhibit List. Defendants identify the exhibits in Index A as exhibits they expect to offer into evidence at trial. Defendants identify the exhibits in Index B as exhibits that Defendants may offer at trial.

In addition to the exhibits included on the indices below, Defendants also reserve the right to introduce any exhibit designated by Blue Flame Medical LLC or JPMorgan Chase Bank,

N.A. to which Defendants do not lodge an objection.

Dated: April 15, 2021

/s/ Donald Burke

Donald Burke (VA Bar No. 76550)
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Counsel for Defendants

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DEFENDANTS' EXHIBIT LIST

EXHIBIT NUMBER	BATES NUMBER	EXHIBIT DATE	DESCRIPTION
DTX001	BFM000163503-514	06/26/2020	Email from Marc Serio to Michael Bueche re: Fwd: As Filed with the Committee, with attachment
DTX002	N/A	10/13/2020	Plaintiff's Responses to Defendants' First Set of Interrogatories to Blue Flame Medical LLC
DTX003	BFM000008866-68	03/20/2020	Email from Chad Jones to Michael Jensen with cc: Mike Gula, Bryan Krastins, Kate Arnold, John Thomas re 3m Mask POs?
DTX004	BFM000008593-94	03/19/2020	Email from John Thomas to Jason Lee, Chad Jones, Mike Gula, Bryan Krasins, Kate Arnold, Michael Jensen re 100,000,000 masks sitting at port of long beach – intro
DTX005	BFM000200058-115	03/20/2020 – 04/29/2020	Texts between Matthew Littman and John Thomas
DTX006	BFM000200119-133	03/20/2020 – 03/27/2020	Texts between Betty Yee (California) and John Thomas
DTX007	BFM000009263-65	03/20/2020	Email from Mike Gula to Chad Jones with cc: Michael Jensen, Kate Arnold, John Thomas re Seller PO – Parkland (DRAFT)
DTX008	BFM000115637-41	03/20/2020	Email from Bill Simonson to John Thomas re FW: Email Connect – DGS and John Thomas
DTX009	BFM000009832-33	03/20/2020	Email from John Thomas to Bill Simonson with bcc: Mike Gula re Medical Supplies Listing with attachment
DTX010	BFM000200135-44	03/22/2020 – 04/09/2020	Texts between Michael Wong (California) and John Thomas

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DTX011	CBB00002342-43 (CAL-OES-00000010-11)	03/23/2020	Email from Abby Browning to Kim Danile, Mitchell Medigovich re specs for COVID-19 supply request with attachment
DTX012	BFM000066185-86	03/23/2020	Email from John Thomas to Michael Wong with bcc: Jennilee@blueflame.agency re Medical Supplies Sheet with attachment
DTX013	BFM000066417-27	03/25/2020	Email from John Thomas to Jennilee Brown, Ethan Bearman re Fwd: Medical Supplies Sheet
DTX014	BFM000074877	03/23/2020	Texts between Betty Yee (California) and John Thomas
DTX015	BFM000012554-60	03/24/2020	Email from John Thomas to Jennilee Brown, Ethan Bearman, Mike Gula re Fwd: Medical Supplies Sheet with attachment
DTX016	BFM000116156-62	03/24/2020	Email from Michael Wong to John Thomas re Medical Supplies Sheet
DTX017	BFM000012804-05	03/25/2020	Email from Mike Gula to John Thomas, Jennilee Brown, Ethan Bearman, Paris Pope re Invoice inventory with attachment
DTX018	BFM000110967-79	03/24/2020	Email from John Thomas to Michael Wong re Medical Supplies Sheet
DTX019	BFM000066391-92	03/25/2020	Email from Ethan Bearman to Mike Gula with cc: Jennilee Brown, John Thomas re Gula make sure the bank knows the wire is coming
DTX020	BFM000111121-22	03/25/2020	Email from John Thomas to Michael Wong re Invoice with attachment
DTX021	BFM000074887	03/25/2020	Texts between Betty Yee (California) and John Thomas
DTX022	BFM000013558-59	03/25/2020	Email from Ethan Bearman to John Thomas, Mike Gula, Jennilee Brown re Latest spreadsheet with attachment
DTX023	BFM000013560-61	03/25/2020	Email from Ethan Bearman to Mike Gula, John Thomas, Jennilee Brown re To get to 100MM with attachment

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EXHIBIT NUMBER	BATES NUMBER	EXHIBIT DATE	DESCRIPTION
DTX024	BFM000116497-98	03/25/2020	Email from Ethan Bearman to John Thomas re Another version of the spreadsheet for Dan Kim with attachment
DTX025	BFM000129957-60	04/21/2020	Email from John Thomas to John Thomas re [no re line] with attachment
DTX026	CBB00002221-89 (CAL-DGS-00000195-263)	03/25/2020	Email from Ethan Bearman to John Thomas with cc: Michael Wong re Intro – Blueflame Corp Counsel with attachments
DTX027	BFM000072285-86	04/08/2020	Email from John Thomas to Michael Wong with cc: Ethan Bearman re Blue Flame Medical N95's
DTX028	BFM000109726-30	04/10/2020	Email from John Thomas to Michael Wong with bcc: Ethan Bearman re 100M Mask Order
DTX029	BFM000076870-74	04/29/2020	Email from John Thomas to Henry Huang with cc: Ethan Bearman, Wujin@winteam500.com re PO1-6 with attachments
DTX030	BFM000120324-27	04/07/2020	Email from Ethan Bearman to Marc Serrio, John Thomas re URGENT PO 1-4 with attachments
DTX031	BFM000125347-48	03/26/2020	Email from Suuchi Ramesh to Mike Gula, John Thomas, Ethan Bearman with cc: Victor Cortes, Mark Herman re Please advise ASAP N95s CE (+ FDA) certified stock
DTX032	BFM000192584	09/15/2020	Email from Marc Serrio to John Thomas, Mike Gula with cc: Ethan Bearman re Cash Balance Down to Minimum Levels
DTX033	N/A	06/12/2020	Blue Flame Medical LLC v. Chain Bridge Bank, John Brough, David Evinger Complaint (E.D. Va. 20cv658)
DTX034	CBB00000523-25	03/23/2020	Delaware Certificate of Formation of Blue Flame Medical LLC

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EXHIBIT NUMBER	BATES NUMBER	EXHIBIT DATE	DESCRIPTION
DTX035	BFM000009163-65	03/20/2020	Email from Kate Arnold to Mike Gula, Chad Jones with cc: Stacie Monroe, Bryan Krastins, Michael Jensen, vitoc44@gmail.com re West Virginia and Louisiana
DTX036	BFM000011436-45	03/23/2020	Email from Mike Gula to Genevieve Hills re FW: Velox Medical Product Inventory
DTX037	BFM000012055-59	03/24/2020	Email from Mike Gula to Brian Chatwin with cc: Tom Datwyler re FW: south koren plant [sic]
DTX038	BFM000012733-39	03/24/2020	Email from Mike Gula to Michael Jensen with cc: Chad Jones, Kate Arnold, Bryan Krastins re Updated invitation: COVID-19 Supplies @ Mon Mar 23, 2020 5:30pm
DTX039	VLX-007876-907	03/05/2020	iMessages for (202) 255-9745
DTX040	BFM000012837-39	03/25/2020	Email from Mike Gula to Paul Sposito re Fwd: COVID help – supplies
DTX041	BFM000013610-11	03/26/2020	Email from Henry Huang to Mike Gula re Attachment order 002 revise with attachment
DTX042	BFM000095501	03/25/2020	State of California General Services Procurement Division Purchasing Authority Purchase Order for Blue Flame Medical LLC
DTX043	CBB00001781-84	03/25/2020	Email from Maria Cole to Mike Gula re wire with attachment
DTX044	CBB00001518-19	03/25/2020	Email from DocuSign System to Maria Cole re Please DocuSign: Blue Flame Medical LLC
DTX045	CBB00000555-56	03/25/2020	Account Agreement for Blue Flame Medical LLC
DTX046	CBB00002563-71	03/25/2020	Email from Mariano Castagnello to Mike Gula re Fwd: need BF Medical EIN/registration with attachments
DTX047	CBB00001202-03	03/27/2020	Email from Tsega Yohannes to Mariano Castagnello re Expected activity

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DTX048	BFM000110311	03/25/2020	Email from Mike Gula to Doug Graham re [no re line]
DTX049	BFM000110662-65	03/22/2020	Email from Mike Gula to Todd Boulanger re Fwd: email thoughts with attachments
DTX050	CBB00002794	03/25/2020	Transcript of call between Mike Gula and Heather Schoeppe
DTX051	CBB00002794	03/26/2020	Call between Mike Gula and Heather Schoeppe
DTX052	CBB00001460-62	03/25/2020	Email from Mike Gula to Maria Cole re wire
DTX053	CBB00001433-36	03/25/2020	Email from Mike Gula to Maria Cole re wire
DTX054	BFM000074101-06	03/26/2020	Email from Mike Gula to John Thomas re Contact Info
DTX055	BFM000202988-3009	03/26/2020	Signal Texts between Ethan Bearman, Mike Gula, and John Thomas
DTX056	CBB00001938-39	03/26/2020	Email from Chain Bridge Bank Wire Department to Mike Gula re INCOMING WIRE CONFIRMATION (send secure) with attachment
DTX057	CBB00000639	03/26/2020	Email from Mike Gula to David Evinger re Coming in. Are you there?
DTX058	BFM000067627-28	03/27/2020	Email from Lindsay Angerholzer to lindsay@blueflame.com re COVID supply help
DTX059	BFM000045714-21	04/14/2020	Email from Mike Gula to Zach Hargett with cc: Morgan Nichols, Brielle Appelbaum re South Carolina COVID-19 Emergency Supply Collaborative with attachments
DTX060	CBB00002313-32 (CAL-DGS-00000292-311)	03/21/2020 – 03/27/2020	Texts between Michael Wong (California) and John Thomas
DTX061	BFM000116128-35	03/24/2020	Email from John Thomas to Michael Wong re Medical Supplies Sheet with attachment

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DTX062	BFM000116274-76	03/25/2020	Email from Ethan Bearman to Michael Wong, John Thomas re Bank Wire instructions for Blue Flame Medical LLC with attachment
DTX063	BFM000111148-50	03/25/2020	Email from John Thomas to Michael Wong re Invoice
DTX064	BFM000116341	03/25/2020	Email from John Thomas to Michael Wong with bcc: Jennilee Brown, Mike Gula re Reminder – Documents
DTX065	CBB00002291-312 (CAL-DGS-00000270-92)	04/03/2020	Email from Mathew Littman to Michael Wong re Calif Details with attachments
DTX066	BFM000113888-94	04/15/2020	Email from John Thomas to Michael Wong re 100M Mask Order
DTX067	CBB00002281-86 (CAL-DGS-00000255-60)	03/25/2020	Texts between Michael Wong (California), Dan Kim (California), and John Thomas
DTX068	BFM000206166-87	07/05/2020	Executive Employment Agreement between Blue Flame Medical LLC and Ethan Bearman
DTX069	BFM000000675-81	03/13/2020	Referral Fee Agreement between Velox Medical and Blue Flame Strategies LLC
DTX070	BFM000198682-700	03/20/2020 – 03/25/2020	Group texts between Ethan Bearman and John Thomas
DTX071	BFM000115813-17	03/22/2020	Email from Ethan Bearman to Mike Gula with cc: John Thomas re Regarding your line list for N95 Protective Masks and Surgical Masks
DTX072	BFM000202805-69	03/24/2020 – 03/27/2020	Signal texts between Ethan Bearman, Mike Gula, and John Thomas
DTX073	BFM000116277	03/25/2020	Email from Ethan Bearman to John Thomas re California Invoice

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DTX074	BFM000066135-36	03/23/2020	Email from Ethan Bearman to John Thomas with cc: Jennilee Brown re Possible spreadsheet to send Suuchi after NDA is signed
DTX075	BFM000116521-22	03/26/2020	Email from Suuchi Ramesh to Ethan Bearman, Mark Herman with cc: John Thomas, Victor Cortes, Ingrid Lacourt re Request on N95 Masks
DTX076	CBB00001385	03/26/2020	Email from Ethan Bearman to Maria Cole with cc: John Thomas, Mike Gula re Blue Flame Medical LLC – Wire Transfer
DTX077	BFM000000668-74	03/13/2020	Referral Fee Agreement between Healthcom Pacific Inc and Blue Flame Strategies LLC
DTX078	BFM000116254-56; 116342-46	03/25/2020	Email from Ethan Bearman to Henry Huang with cc: John Thomas, Mike Gula re Healthcom Pacific Inc. Referral Fee Agreement with attachment
DTX079	CBB00002779	3/26/2020	Fedwire Funds Processor Completed
DTX080	CBB00002780	03/26/2020	Fedwire Funds Processor Completed
DTX081	CBB00002786	03/26/2020	Call between Maria Cole and John Thomas
DTX082	CBB00002787	03/26/2020	Call between Maria Cole and John Thomas
DTX083	CBB00002788	03/26/2020	Call between Maria Cole and John Thomas
DTX084	CBB00002501-505	03/26/2020	California warrants for N95 mask purchase
DTX085	BFM000163112-113	03/26/2020	Memo from Andrew Sturfels to Natalie Gonzales authorizing \$465,888,600.00 wire for purchase of N95 masks from Blue Flame Medical
DTX086	JPMC-00000027-28	03/26/2020	Email from Ana Prieto to Natalie Gonzales indicating that wire had been released
DTX087	N/A	05/11/2020	Testimony of Fiona Ma at 05/11/2020 hearing before the California State Assembly

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DTX088	BFM_CA_STO0001 (STO0626-648)	03/26/2020	Email from Natalie Gonzales to Amin Pirasteh noting that it's "really weird" neither of them can find reference to Blue Flame Medical on the internet
DTX089	JPMC-00000135	03/26/2020	Email from Natalie Gonzales to Ana Prieto asking whether it's possible to reach out to CBB for an update re the return wire
DTX090	SCO0131-56	03/26/2020	Email from Andrew Sturfels to Karen Ross Greene, Rick Chivaro, Natalie Gonzales, Fee Chang, Monica Cuellar, Andre Rivera, Dan Kim, Allan Watson with cc: Jim Spano, Jutta, Angela Shell, Jason Hollingsworth, Karen Finn, Bill Simonson, Lilian Lee, Coleen Morrow, Bertha Mejia, Jennifer Chavez, Shirley Dong, Roland Mar, Elizabeth Gonzalez, Michael Wong re email chain restored w/all who need to know..
DTX091	CBB00002699-70	03/25/2020	Email from Mike Gula to David Evinger, John Brough re Screenshot 2020-03-25 at 6.26.08 PM with attachment
DTX092	CBB00002686	03/26/2020	Email from Mike Gula to David Evinger re Blue Flame Medical / Fighting Coronavirus
DTX093	CBB00002543	03/26/2020	Call between David Evinger and Fee Chang
DTX094	CBB00002545	03/26/2020	Call between John Brough, David Evinger, and Tim Coffey
DTX095	CBB00004445	03/25/2020	Handwritten notes of John Brough
DTX096	BFM000013445-48	03/25/2020	Email from Mike Gula to John Brough, David Evinger re Contact Info with attachment
DTX097	CBB00002541	03/26/2020	Call between John Brough, David Evinger, and Rakesh Korpai
DTX098	CBB00002544	03/26/2020	Call between John Brough, David Evinger, and Rakesh Korpai

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DTX099	JPMC-00000084-88	03/26/2020	Email from Jenifer Robinson to Rakesh Korpall re FW [RFI-89021]: EXPEDITE REVIEW/APPROVAL Held Payment >=\$50MM USD CLIENT NAME: CALIFORNIA STATE TREASURER SP CASE ID: with attachments
DTX100	JPMC-00000089-94	03/26/2020	Email from Jenifer Robinson to Rakesh Korpall re FW [RFI-89021]: EXPEDITE REVIEW/APPROVAL Held Payment >=\$50MM USD CLIENT NAME: CALIFORNIA STATE TREASURER SP CASE ID: with attachments
DTX101	JPMC-00000392-93	03/27/2020	Email from Alexander Leonard to Art Neville, Alex Grant with cc: Daniel Wilkening, Brian Page, Rakesh Korpall, June Cantrell, Joshua Pope, Mike Kelly Michael Nevins re Confidential State of California
DTX102	JPMC-00000003-5	03/26/2020	Email from Fraud Alert to Jenifer Robinson, Rakesh Korpall, Timothy Coffey with cc: Michelle Long re [RFI-89021]: EXPEDITE REVIEW/APPROVAL Held Payment >=\$50MM USD CLIENT NAME: CALIFORNIA STATE TREASURER SP CASE ID: with attachments
DTX103	CBB00002784	03/26/2020	Recording of call to Chain Bridge Bank (Mariano Castagnello) from Tim Coffey requesting to speak to fraud or wire transfer department
DTX104	JPMC-00000101-05	03/26/2020	Email from Tim Coffey to Debra Naughton with cc: Rakesh Korpall) re PRPC case JPM200326-004818 with attachments
DTX105	JPMC-00000386	05/21/2020	Email from Fiona Ma to Jamie Dimon with cc; Tim Schaefer, Genevieve Jopanda re Thank You
DTX106	DGS2491-95	03/25/2020	State of California Purchasing Authority Purchase Order with attachments
DTX107	JPMC-00000009	03/26/2020	Email from Timothy Coffey to Fraud Alert, Jenifer Robinson, Rakesh Korpall, Michelle Long re [RFI-89021]: EXPEDITE

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			REVIEW/APPROVAL Held Payment >=\$50MM USD CLIENT NAME: CALIFORNIA STATE TREASURER SP CASE ID:
DTX108	JPMC-00000170-76	03/26/2020	Email from Timothy Coffey to Debra Naughton with cc: Rakesh Korpall re PRPC case JPM200326-004818 with attachments
DTX109	N/A	01/22/2021	Subpoena to Testify at a Deposition in a Civil Action to the California State Controller's Office
DTX110	SCO1521-80	03/20/2020 – 03/27/2020	Texts between Betty Yee (California) and John Thomas
DTX111	DGS5408-09	03/26/2020	Email from Mai Chang to Naoko Reese with cc: Thanh Thao Au, Robert Bachiller, Bla Lee, Anthony Cantrell, Tawnya Castro Harris, Samantha Curry, Debra Rossaro, Kristoffer Hernandex, Molly McClure, Patti Moore, Thy Nguyen, Greg Okumura, Tracy Oliver, Tadashi Taira, Nicholas Walls re DENIED SID 0000160359 BLUE FLAME MEDICAL LLC
DTX112	BFM000121643-647	04/10/2020	PO-20200410-002 dated 4/10/20 from Blue Flame Medical, LLC to Quonset Development Corporation
DTX113	BFM000072442-443	04/09/2020	Blue Flame Medical Bulk Price Sheet on 4-09-20
DTX114	BFM000128078-079	04/16/2020 – 04/17/2020	Emails between Matthew Hayes (Tennessee) and John Thomas re: [EXTERNAL] Updated Costs And Potential Solutions
DTX115	BFM000063226	04/29/2020	Emails between Julia Pickle (Alabama) and Mike Gula
DTX116	BFM000134376	05/01/2020	Sales Quote to the State of Colorado
DTX117	BFM000080369	05/04/2020	Email from Colorado to John Thomas and Tracy Austin re: Firm Denial – Quote packet received

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DTX118	BFM000080065	05/04/2020	Email from Ethan Bearman to John Thomas, Michael Collins, Marc Serrio re: Colorado
DTX119	BFM000126777	04/09/2020	Purchase Order issued April 9, 2020 to Office of Governor Jay Inslee
DTX120	BFM000126774-779	04/13/2020	Email from Ethan Bearman to Elena McGraw re: isolation gown pic/certificate
DTX121	BFM000046448-459	04/15/2020	Email from Mike Gula to Bradley Knox (Tennessee) re: WA State COVID-19 Supplies – Isolation Gowns Questions – Time Sensitive
DTX122	BFM000050658-659	04/16/2020- 04/18/2020	Emails between Elena McGraw and Mike Gula re: We want to work with you on price point
DTX123	DGS6516-6518	10/26/2020	Dan Kim Typed Noted
DTX124	DGS2493	03/24/2020	Payee Data Record for Blue Flame Medical
DTX125	DGS2948-2959	03/25/2020	Email from Andrew Sturmfels to Karen Greene Ross, Dan Kim, Jutta Wiechec re: email chain restored w/all who need to know....
DTX126	DGS0775-0787	03/25/2020	Email from Dan Kim to Allan Watson Re: email chain restored w/all who need to know.....
DTX127	DGS5363-5365	03/25/2020 – 03/27/2020	Texts between Dan Kim (California) and John Thomas
DTX128	BFM000200134	03/25/2020 – 03/27/2020	Texts between Dan Kim (California) and John Thomas
DTX129	DGS4966-4980	03/24/2020 – 03/25/2020	Email from Karen Greene Ross to Dan Kim Re: email chain restored w/all who need to know...
DTX130	DGS6030-6049	03/25/2020 – 03/26/2020	Email from Dan Kim to Monica Cuella, Andre Rivera, Andrew Sturmfels, Allan Watson Re: email chain restored w/all who need to know....

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DTX131	DGS8016-8021	N/A	Chronology of email correspondence and notes taken by Dan Kim
DTX132	BFM000007156	03/17/2020	Email from Mike Gula to Mike Gula re: Current contracts 3.17
DTX133	BFM000012806-807	03/25/2020	Email from Mike Gula to John Thomas, Jennilee Brown, Ethan Bearman, Paris Pope, RE: Invoice Inventory
DTX134	BFM000012824-825	03/25/2020	Email from Mike Gula to Ethan Bearman re: Gula make sure the bank knows the wire is coming
DTX135	BFM000198724-736	03/22/2020- 05/06/2020	Texts between Matthew Littman, Ethan Bearman, and John Thomas
DTX136	BFM_DGS0294-0322	07/29/2020	Ltr. from Jennifer Dauer to Angela Shell (CA Procurement) Re: Purchase Order No. M12948-T6619 to Blue Flame Medical LLC
DTX137	BFM000162406-07	06/17/2020	Emails from Matthew Swift to Michael Gula re: Blue Flame Medical Files Suit Against Chain Bridge Bank.pdf
DTX138	BFM000206162	N/A	Video with file name signal-2020-03-25-094152.mp4
DTX139	N/A	03/09/2021	Chain Bridge Bancorp, Incorporated 2019 Annual Report
DTX140	N/A	02/02/2021	Excerpt from John Brough deposition transcript
DTX141	N/A	02/27/2015	Excerpt from Bank Secrecy Act/Anti-Money Laundering Examination Manual Appendix F
DTX142	N/A	03/26/2020	FBI Press Release: FBI Warns Health Care Professionals of Increased Potential for Fraudulent Sales of COVID-19 Related Medical Equipment
DTX143	N/A	11/19/2011	Fedwire Funds Service Format Reference Guide
DTX144	CBB00002781	03/26/2020	Fedwire Funds Processor Message
DTX145	N/A	2014	The ABCs of the UCC by Thomas C. Baxter Jr. et al.

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DTX146	JPMC-00000533-534	12/28/2020	Ltr. from Alan E. Schoenfeld (WilmerHale) to Spencer Walker (California) re: Reservation of Rights Regarding March 26, 2020 Wire Transfer to Blue Flame Medical LLC
DTX147	JPMC-00000535-599	03/20/2021	Email from Alan E. Schoenfeld to Spencer Walker re: JPMorgan Chase Bank, N.A. / Notice of Claim, with attachments
DTX148	BFM000047291-92	04/15/2020	Assignment, Acknowledge, and General Obligation Pledge with County of San Mateo
DTX149	BFM00032772-773	04/07/2020	Emails between Henry Huang and Mike Gula re: URGENT PO 1-4
DTX150	CBB00004468	N/A	Silverlake Screenshot of Blue Flame Medical LLC Checking Account
DTX151	SDS000078-143	03/20/2020- 12/14/2020	Text messages between Stephanie Daily Smith and Matthew Littman
DTX152	SDS000144-153	03/20/2020	Texts between Stephanie Daily Smith and Betty Yee
DTX153	BFM000110641	03/21/2020	Email from John Thomas to Stephanie Smith re: medical supplies sales sheet
DTX154	BFM000111228-231	03/25/2020	Email from John Thomas to Stephanie Smith re: Fwd: Bank Wire Instructions for Blue Flame Medical LLC
DTX155	SDS00072-074	04/04/2020	Emails between Lee Rosenberg and Stephanie Smith
DTX156	N/A	03/15/2021	Ltr. from Amanda Touchton (attorney for Matthew Littman) to Matt Madden (attorney for Defendants) re: Subpoena to Mathew Littman in Blue Flame Medical, LLC v. Chain Bridge Bank, et al.
DTX157	SDS0001-077	03/20/2020- 04/27/2020	Stephanie Smith emails

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DTX158	BFM000206553-559	06/05/2020	Ltr. from Douglas F. Gansler (Cadwalader) to Lauri A. McGuire (Maryland Department of General Services) Re: Blue Flame Medical, LLC – Purchase Order #H00P0601445
DTX159	BFM_CA_DGS6555-6565	04/01/2020-05/23/2020	California Department of General Services Emails between Michael Wong, Angela Shell, et al.
DTX160	N/A	12/2019	Federal Reserve Banks Operating Circular No. 6
DTX161	BFM000204231	11/2/2020	60 Minutes Video
DTX162	N/A	12/06/2020	CBS News Article: Inside the chaotic PPE market where shortages of critical supplies persist
DTX163	N/A	05/11/2020	Audio/Video of California State Assembly Hearing for the Committee on Accountability and Administrative Review
DTX164	CBB00002608	N/A	SilverLake Xperience Screenshot of Blue Flame Medical LLC Transaction History

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EXHIBIT NUMBER	BATES NUMBER	EXHIBIT DATE	DESCRIPTION
DTX165	BFM000002416-430	N/A	Blue Flame Medical Presentation
DTX166	CBB00002569-571	03/23/2020	State of Delaware Limited Liability Company Certificate of Formation for Blue Flame Medical LLC
DTX167	CBB00001198-199	02/10/2020	State of Delaware Limited Liability Company Certificate of Formation for Blue Flame Strategies LLC
DTX168	BFM000115483-490	03/16/2020	Email from Maria Cole to Michael Gula, cc'ing Mariano Castagnello, Mike Richardson, and Brad Ward, "Re: New Account", with attachments
DTX169	CBB00001952-62	03/13/2020	Email from Michael Gula to Melissa Strano, cc'ing John Thomas, "Fwd: new business", with attachments
DTX170	CBB00004391-392	03/16/2020	Account Agreement between Chain Bridge Bank, N.A. and Blue Flame Strategies LLC
DTX171	CBB00001574-79	03/17/2020	Email from Michael Gula to Maria Cole, cc'ing John Thomas, "NEW business account needed", with attachment
DTX172	CBB00004380-381	03/18/2020	Account Agreement between Chain Bridge Bank, N.A. and Redline Strategies LLC
DTX173	BFM000137279-280	05/09/2020	Email from Michael Gula to Brielle Appelbaum, "Fwd: My memory of the call with Chain Bridge Bank"
DTX174	CBB00004463-467	N/A	Brough Typed Notes
DTX175	CBB00002124-125	03/25/2020	Email from Allan Watson to Jim Spano et al., "email chain restored w/all who need to know....."
DTX176	CBB00000728-729	03/26/2020	Email from David Evinger to Jennifer Lincoln, John Brough, and Farrukh Memon, cc'ing Wires, "RE: Incoming Large Wire"

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DTX177	CBB00004235-273	03/2020	Bank Secrecy Act, Anti Money Laundering Control, and Office of Foreign Assets Control Policy, Chain Bridge Bank, N.A.
DTX178	CBB00004274-276	09/2016	Suspicious Activities Procedures, Chain Bridge Bank, N.A.
DTX179	CBB00004302-306	N/A	Wire Transfer Procedures, Chain Bridge Bank, N.A.
DTX180	CBB00004307-09	01/2018	Funds Availability (Regulation CC) Policy, Chain Bridge Bank, N.A.,
DTX181	CBB00004277-278	09/12/2019	“BSA Policy Review: Questionable and Suspicious Activity Reporting (BSA Policy Pages 32 - 35),” BSA Training – BSA Policy Review, Chain Bridge Bank, N.A.
DTX182	CBB00002609-610	N/A	Funds Availability Disclosure, Chain Bridge Bank N.A.,
DTX183	BFM000116345-346	03/25/2020	First Amendment and Addendum to Referral Fee Agreement between Healthcom Pacific Inc. and Blue Flame Strategies LLC
DTX184	BFM000021076-94	04/01/2020	Email from Michael Gula to Julio Cabral re: Medical Supplies – Blue Flame Medical, with attachments
DTX185	BFM000170149-174	03/31/2020	Email from Ethan Bearman to Marc Serrio (Blue Flame) re: FW: Wire Info, with Product Reseller Agreement attachments
DTX186	BFM000076873-874	04/29/2020	Letter from Great Health to Blue Flame Re: Cancellation of Order Confirmation No. 1001-1004, 1006; Blue Flame Medical as Reseller
DTX187	CAL-OES-00000020-026	03/23/2020	Emails from Abby Browning to Mike Gula et al re: Updated invitation: COVID-19 Supplies @ Mon Mar 23, 2020 5:30pm – 6:30pm (MDT) (abby.browning@caloes.ca.gov)
DTX188	BFM000066087-088	03/22/2020	Email from Kate Arnold (Velox Medical) to Brian Merrick (State of Massachusetts) re: Update on Supply-Urgent
DTX189	BFM000008038-039	03/19/2020	Email from Henry Huang to Michael Jensen et al. re: Velox Daily Shipping Request—March 18

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DTX190	BFM000011979-982	03/24/2020	Texts between Mike Gula and Henry Huang
DTX191	BFM000012279-285	03/23/2020	Email from Suuchi Ramesh to Ethan Bearman et al. RE: RE: Email 2 pricing from Suuchi Inc
DTX192	BFM000077942-956	03/21/2020	Texts between Suuchi Ramesh and Ethan Bearman
DTX193	BFM000116424-425	03/25/2020	Purchase Order from Blue Flame to Suuchi
DTX194	BFM000013830	03/26/2020	Email from Suuchi Ramesh to Mike Gula et al. re: PO Status
DTX195	BFM000066389-390	03/25/2020	Email from John Thomas to Mike Gula et al. re: Invoice Inventory
DTX196	BFM000116525-527	03/26/2020	Email from Suuchi Ramesh to Ethan Bearman re: Request on N95 Masks
DTX197	BFM000138783-799	04/15/2020	Federal Grand Jury Subpoena to Blue Flame Medical, US Attorney's Office, Central District of California
DTX198	BFM000157939-943	06/08/2020	Email from Tung Khuu to Michael Skoglund et al re: Blue Flame Medical, LLC PPE Subpoenas and Investigations Additional subpoenas from Maryland and U.S. DOJ – E.D. Virginia, with attachment
DTX199	CBB00002646-648	05/18/2020	Ltr. from Frank Pallone, Jr., Diana DeGette, U.S. House of Representatives Committee on Energy and Commerce to Mike Gula
DTX200	CBB00004323-362	03/26/2020	Selected Chain Bridge Bank Call Logs
DTX201	CBB00002765-778	N/A	Terms and Conditions of Your Account

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DTX202	CBB00001743-747	03/17/2020- 03/25/2020	Emails between Maria Cole and Mike Gula re: wire
DTX203	N/A	04/13/2020	FBI Warns of Advance Fee and BEC Schemes Related to Procurement of PPE and Other Supplies During COVID-19 Pandemic
DTX204	N/A	03/16/2020	The Financial Crimes Enforcement Network (FinCEN) Encourages Financial Institutions to Communicate Concerns Related to the Coronavirus Disease 2019 (COVID-19) and to Remain Alert to Related Illicit Financial Activity
DTX205	BFM000212491- 501	03/21/2020- 03/26/2020	Texts between Matt Littman, Stephanie Daily Smith, and John Thomas
DTX206	BFM000212479	03/24/2020	Texts between Stephanie Smith, John Thomas, and Betty Yee
DTX207	BFM000212468- 478	03/20/2020- 03/24/2020	Texts between John Thomas and Stephanie Roberson (California Nurses Association)
DTX208	BFM000212939- 964	03/26/2020- 04/29/2020	Texts between John Thomas and Marc Serrio
DTX209	BFM000212912- 938	03/13/2020- 04/29/2020	Texts between John Thomas and Henry Huang
DTX210	BFM000212703- 733	03/16/2020- 04/26/2020	Texts between Mike Gula, John Thomas, and Henry Huang
DTX211	BFM000212965- 3013	03/20/2020- 04/29/2020	Texts between Matt Littman and John Thomas
DTX212	BFM000126009-10	04/06/2020	Email from Marc Serrio to Henry Huang re: proof of funds for Henry, with attachment

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DTX213	N/A	09/17/2020	Laurel Rosenhall, Exclusive: California wires mask dealer half a billion dollars, then claws it back, Cal Matters
DTX214	N/A	05/02/2020	Tom Hamburger and Juliet Eilperin, Maryland cancels \$12.5 million PPE contract with firm started by GOP operatives, The Washington Post
DTX215	N/A	05/06/2020	Tom Hamburger and Juliet Eilperin, Justice Department investigates Blue Flame Medical after claims that it failed to provide masks to Maryland
DTX216	N/A	05/06/2020	Kenneth P. Vogel, Firm Set Up by G.O.P. Operatives Under Scrutiny Over Virus Contracts, The New York Times
DTX217	N/A	05/02/2020	The Baltimore Sun, Maryland seeks investigation of politically connected company that hasn't delivered masks, ventilators
DTX218	N/A	05/02/2020	Brody Mullins and Susan Pulliam, Maryland Cancels Big Coronavirus Mask Order, The Wall Street Journal
DTX219	CBB00000655-57	03/26/2020	Email from Heather Schoeppe to Maria Cole, John Brough, David Evinger, Mike Richardson re Blue Flame Medical LLC – Wire Transfer
DTX220	CBB000002529-36	03/26/2020	Chain Bridge Bank GL History Print Optical Report OutQ
DTX221	CBB00001770-72	03/25/2020	Email from Maria Cole to Mike Richardson re wire
DTX222	CBB00002725-29	03/26/2020	Email from Peter Fitzgerald to John Brough re \$450 Million wire came in
DTX223	JPMC-00000123	03/26/2020	Email from Rakesh Korpall to Patricia Wiltz re Conversation initiated by rakesh.korpall@jpmchase.com

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DTX224	JPMC-00000194-95	03/26/2020	Email from June Cantrell to Lisa Lucchese re California State Treasurer's Office (STO) – Wire
DTX225	JPMC-00000231-32	03/26/2020	Email from June Cantrell to Daniel Wilkening re California State Treasurer's Office (STO) – Wire
DTX226	JPMC-00000239-42	03/27/2020	Email from Nikki Ticzon to Rakesh Korpall, Jenifer Robinson, Timothy Coffey, Akhil Kedia re [re line empty] with attachments
DTX227	JPMC-00000243	03/27/2020	Email from Rakesh Korpall to Rakesh Korpall, Timothy Coffey re Conversation with Korpall, Rakesh (CIB OPS, USA)
DTX228	JPMC-00000244	04/15/2020	Email from Rakesh Korpall to Timothy Coffey re Conversation initiated by rakesh.korpall@jpmchase.com
DTX229	JPMC-00000461-63	N/A	March and April Handwritten notes
DTX230	SCO0221-45	03/26/2020	Email from Andrew Sturfels to Karen Greene Ross, Rick Chivaro, Natalie Gonzales, Fee Chang, Monica Cuellar, Andre Rivera, Kim Daniel, Allan Watson with cc: Jim Spano, Jutta Wiechec, Angela Shell, Jason Hollingsworth, Karen Finn, Bill Simonson, Lilian lee, Coleen Morrow, Bertha Mejia, Jennifer Chavez, Shirley Dong, Roland Mar, Elizabeth Gonzalez, Michael Wong re email chain restored w/all who need to know....
DTX231	CBB00000853-56	03/25/2020	Email from Heather Schoeppe to Mike Richardson re Blue Flame Medical incoming wire 450 million
DTX232	CBB00002795	03/25/2020	Call between Mike Gula and Heather Schoeppe
DTX233	CBB00002797	03/25/2020	Call between Heather Schoeppe and Joanna Williamson
DTX234	CBB00002798	03/25/2020	Call between Heather Schoeppe, John Brough, and David Evinger

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EXHIBIT NUMBER	BATES NUMBER	EXHIBIT DATE	DESCRIPTION
DTX235	CBB00001097-101	03/25/2020	Email from Maria Cole to Mike Richardson with cc: Heather Schoeppe re Blue Flame Medical incoming wire 450 million
DTX236	CBB00000761-63	03/25/2020	Email from Heather Schoeppe to John Brough with cc: Mike Richardson, Joanna Williamson, David Evinger re Blue Flame Medical incoming wire 450 million
DTX237	CBB00002673-77	03/26/2020	Email from Heather Schoeppe to John Brough, Tsega Yohannes, Betsy Sharon, Nancy Kelly with cc: David Evinger, Tais Ribeiro, Mike Richardson, Joanna Williamson re Contact Info
DTX238	CBB00002649	3/26/2020	Wire Transfers Display
DTX239	CBB00001008-29	3/26/2020	Email from Mike Richardson to Maria Cole with cc: Heather Schoeppe re Blue Flame Medical incoming wire 450 million with attachment
DTX240	CBB00000748	03/26/2020	Email from John Brough to Jennifer Lincoln, David Evinger, Joanna Williamson, Farrukh Memon, Heather Schoeppe, Mike Richardson with cc: Wires re Incoming Large Wire
DTX241	CBB00000971-80	3/26/2020	Email from Maria Cole to Mike Richardson, Claudia Mojica with cc: Heather Schoeppe, Wires re Blue Flame Medical incoming wire 450 million
DTX242	CBB00000919-29	03/26/2020	Email from Maria Cole to Mike Richardson, Thais Ribeiro, Jennifer Lincoln, Claudia Mojica with cc: Heather Schoeppe, Wires re Blue Flame Medical incoming wire 450 million
DTX243	CBB00000718-27	03/26/2020	Email from Heather Schoeppe to David Evinger, Mike Richardson, John Brough, Joanna Williamson with cc: Maria Cole re Blue Flame Medical incoming wire 450 million

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DTX244	CBB00000815-17	03/26/2020	Email from Heather Schoeppe to Thais Ribeiro re Please close BlueFlame Accounts
DTX245	CBB00000527	03/27/2020	Email from John Brough to Heather Schoeppe, Mariano Castagnello, Angeli Nanali, Mubeen Baig, Najwa Alwazir, M. Strano, Maria Cole, Mike Richardson, Brad Ward, Sametta Bailey, Pat Collins, Barry Huitema, Marcia Bradford with cc: David Evinger, Betsy Sharon, Tsega Yohannes, Thais Ribeiro re No new accounts for these clients
DTX246	CBB00002650	03/26/2020	Wire Transfers Display
DTX247	CBB00002789	03/26/2020	Call between Claudia Mojica-Guadron, John Brough, David Evinger, and Thais Ribeiro
DTX248	CBB00000640-42	03/26/2020	Email from Claudia Mojica to John Brough, David Evinger, Thais Ribeiro re Message from JPMorgan Chase – Large Incoming Wire with attachment
DTX249	CBB00000795-96	03/26/2020	Email from David Evinger to Thais Ribeiro, John Brough, Claudia Mojica with cc: Tim Ahmad re Message from JPMorgan Chase – Large Incoming Wire
DTX250	CBB000002653-54	03/26/2020	Wire Transfers Display
DTX251	CBB00000791-94	03/26/2020	Email from David Evinger to John Brough, Claudia Mojica, Tim Ahmad with cc: Thais Ribeiro re Message from JPMorgan Chase – Large Incoming Wire
DTX252	CBB00003573-74	03/25/2020	Email from Maria Cole to Mike Gula re wire
DTX253	CBB00004437	03/26/2020	Cell Phone Record for Maria Cole

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EXHIBIT NUMBER	BATES NUMBER	EXHIBIT DATE	DESCRIPTION
DTX254	CBB00001725-26	03/26/2020	Email from Maria Cole to John Thomas with cc: Mike Gula, Mike Richardson re Wire Request Form with attachment
DTX255	DGS0201-02	03/26/2020	Email from Fee Chang to Natalie Gonzales with cc: Andrew Sturmfels re Urgent – request call from CEO/President of Chain Bridge Bank
DTX256	CBB00000779-81	03/25/2020	Email from John Brough to David Evinger re Blue Flame Medical incoming wire 450 million
DTX257	CBB00004453-62	N/A	Notes of David Evinger
DTX258	CBB00000807	03/26/2020	Email from David Evinger to Jennifer Lincoln, John Brough, Joanna Williamson, Farrukh Memon with cc Wires re Incoming Large Wire
DTX259	N/A	01/06/2021	Plaintiff's Notice of Rule 30(b)(6) Videotaped Deposition of JPMorgan Chase Bank, N.A. (Rakesh Korpai)
DTX260	JPMC-00000013	03/26/2020	Email from Ana Prieto to Mackson Pereira re Conversation initiated by ana.c.prieto@jpmorgan.com
DTX261	JPMC-00000027-30	03/26/2020	Email from Ana Prieto to Natalie Gonzales with cc: Cash Desk, Art Neville, Tamara Brown, Angelique Uribe re 03/26/20 Large Outgoing Wire [202003260005534] with attachments
DTX262	JPMC-00000036-40	03/26/2020	Email from Brian Page to Art Neville, Alexander Leonard with cc: June Cantrell, Ana Prieto re 03/26/20 STO Large Outgoing Wire with attachments
DTX263	JPMC-00000046	03/26/2020	Email from June Cantrell to Rakesh Korpai re Conversation initiated by June.m.cantrell@chase.com
DTX264	JPMC-00000049-53	03/26/2020	Email from June Cantrell to Rakesh Korpai re FW 03/26/20 Large Outgoing Wire with attachments

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DTX265	JPMC-00000068	03/26/2020	Email from Timothy Coffey to Rakesh Korpall re Conversation initiated by timothy.p.coffey@jpmchase.com
DTX266	JPMC-00000069	03/26/2020	Skype conversation between June Cantrell and Rakesh Korpall
DTX267	JPMC-00000119	03/26/2020	Email from Rakesh Korpall to Shinu Varghese re Conversation initiated by rakesh.korpall@jpmchase.com
DTX268	JPMC-00000121	03/26/2020	Email from Rakesh Korpall to Michael Smith re Conversation initiated by rakesh.korpall@jpmchase.com
DTX269	JPMC-00000247	04/15/2020	Email from Timothy Coffey to Brian Stephenson re \$456MM/Chain Bridge Bank/JPM200326-004818/ Funds recovered on 3/26
DTX270	JPMC-00000270	05/04/2020	Email from Rakesh Korpall to Brian Stephenson re Conversation initiated by rakesh.korpall@jpmchase.com
DTX271	JPMC-00000465	03/26/2020	Handwritten notes
DTX272	JPMC-00000469-70	03/26/2020	JPMC Transaction Reference Number: 2693100086JO/Client Name: California State Treasurer Alert Summary
DTX273	DGS0960	12/16/2020	Email from Lilian Lee to Fee Chang [no re line]
DTX274	DGS4006-30	03/26/2020	Email from Natalie Gonzales to Fee Chang with cc: Andrew Sturmfels, Lilian Lee re Urgent – request call from CEO/President of Chain Bridge Bank
DTX275	DGS0209-10	03/26/2020	Email from Andrew Sturmfels to Andre Rivera re email chain restored w/all who need to know....
DTX276	BFM000009562-565	03/20/2020	Email from Ethan Bearman to Mike Gula re: Fwd: New voicemail
DTX277	JPMC-00000394-395	06/16/2020	Email from Art Neville to Rakesh Korpall and Rosalyn Nguyen re: Confidential: State of California

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EXHIBIT NUMBER	BATES NUMBER	EXHIBIT DATE	DESCRIPTION
DTX278	JPMC-00000070	03/26/2020	Messages from June Cantrell to Rakesh Korpall re: Conversation initiated by rakesh.korpall@jpmchase.com
DTX279	BFM000117809-835	03/31/2020	Email from Ethan Bearman to Marc Serrio re: FW: Wire info
DTX280	BFM000077716-17	N/A	Ltr. from Danny Mays (Maryland) to Mike Gula re: Purchase Order #H00P0601445
DTX281	BFM000111223-227	03/25/2020	Email from John Thomas to Abby Browning re: Facemask sample?
DTX282	BFM000074866	03/25/2020	Text messages between Betty Yee and John Thomas
DTX283	BFM000065351-53	04/30/2020	Email from Marc Serrio to John Thomas and Mike Gula re: Cash Position Snapshot
DTX284	BFM000048393-396	04/16/2020	Email from Marc Serrio to Henry Huang, Mike Gula, Ethan Bearman, and Joy Xu re: Updated PO 1006 (Chicago) and Funds Sent to Wingar
DTX285	BFM000046589-593	04/15/2020	Email from Ethan Bearman to Mike Gula re: Fwd: URGENT PO 1-4
DTX286	BFM000018938-940	04/01/2020	Email from Ethan Bearman to Mike Gula re: Wiring Instructions
DTX287	CBB00004294-301	03/2014	Chain Bridge Bank, N.A. Wire Transfer Policy
DTX288	N/A	05/06/2020	Sophia Bollag et al., ‘Urgency and panic’: Inside Gov. Gavin Newsom’s rush to buy coronavirus gear, The Sacramento Bee
DTX289	BFM000001582	03/26/2020	Great Health Companion Order Confirmation

CERTIFICATE OF SERVICE

I hereby certify that on April 15, 2021, I will cause the foregoing to be served via email
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